

JOSEPH & KIRSCHENBAUM LLP

Attorneys at Law

Charles Joseph
D. Maimon Kirschenbaum
Denise Schulman
Josef Nussbaum
Lucas C. Buzzard

32 Broadway, Suite 601
New York, NY 10004
Phone (212) 688-5640
Fax (212) 688-2548
www.jk-llp.com

August 6, 2021

Hon. Colleen McMahon
U.S. District Court for the Southern District of New York
500 Pearl Street, Room 2250
New York, NY 10007

Re: *Mondelo v. Quinn, Emanuel, Urquhart & Sullivan, LLP, et al.*
Index No. 21-cv-2512 (CM)

Dear Judge McMahon:

We represent Plaintiff Nicholas Mondelo in the above-captioned action. We write jointly with Defendants to: (1) inform the Court that Plaintiff filed an Amended Complaint pursuant to Fed. R. Civ. P. 15(a)(1)(B) on August 2, 2021, *see* ECF Dkt No. 20; and (2) request a briefing schedule on Defendants' anticipated motion to dismiss that Amended Complaint.

The parties respectfully request the following briefing schedule on Defendants' motion:

- August 17, 2021 – Defendants' motion due.
- September 14, 2021 – Plaintiff's opposition due.
- October 5, 2021 – Defendants' reply due.

This is the parties' first request for a briefing schedule on Defendants' anticipated motion to dismiss the Amended Complaint. The requested briefing schedule would not affect any other scheduled dates in this matter, as the Court previously cancelled the initial conference pending the culmination of briefing on Defendants' motion to dismiss the original Complaint. *See* ECF Dkt No. 19 (Order).

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/Lucas C. Buzzard
Lucas C. Buzzard